

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GEORGIANNA SAVAS,

Plaintiff,

12 CIV 1248 (VM)

-against-

ZACHARIAS GEORGIOU PORTALAKIS,

Defendant.

**AFFIDAVIT IN
SUPPORT OF
MOTION TO
DISMISS**

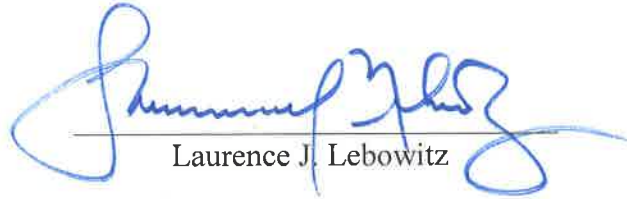
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State of New York)
)ss.:
County of New York)

LAURENCE J. LEBOWITZ, being duly sworn deposes and says:

1. I am member of Ballon, Stoll, Bader & Nadler, P.C. trial counsel to Nicholas Patouris, attorney for the Defendant, Zacharias G. Portalakis. As such, I am fully familiar with all of the pleadings and proceedings heretofore had in this matter.
2. The instant action was commenced by the filing of a Summons and Complaint on February 7, 2012.
3. Defendant, a resident of Athens, Greece and a Greek citizen, was served with a copy of the Summons and Complaint in Athens pursuant to the terms of the Hague Convention.
4. Appended hereto as Exhibit "A" is a true copy of the Plaintiff's Complaint.
5. As the Court can see from a reading of the Complaint this dispute revolves around the ownership of certain works of art and personal effects of the artist known as "Stamos."
6. In lieu of an Answer, Defendant seeks dismissal of the Complaint on a variety of grounds, including lack of personal jurisdiction, prior pending action and inconvenient forum.
7. In addition to this Affidavit and the Complaint appended hereto as an exhibit, submitted herewith in support of Defendant's motion are the Defendant's Declaration with exhibits; Affidavit of Cristos Gianakos, with exhibits; and Memorandum of Law.

Wherefore, your affiant respectfully requests that this court grant Defendant's Motion to Dismiss the Complaint in its entirety and granting Defendant such other and further relief as the Court deems just and proper, including the costs and disbursements of this action.



Laurence J. Lebowitz

Sworn to before me this
25 day of May 2012



Notary Public

Dave McLeod
Notary Public, State of New York
No. 01MC6214677
Qualified in Kings County
Commission Expires December 14, 2013